

### **REMARKS**

Claims 1-16 are pending in the present application. Claims 1-16 have been rejected. Claims 2, 5, 8, 9, 11, 14, and 16 have been amended.

Claims 9, 11, 14, and 16 have been objected to because of various informalities. Claims 9 and 14 have been appropriately amended. With respect to claims 11 and 16, the Office Action states that limitations following the phrase “for” do not carry patentable weight, and cause the claims to appear as a series of non-functional descriptive material / data without any functional relation with each other. It is respectfully submitted that “for” is part of the phrase “a context for queries” within the larger phrase “a first class that represents a storage platform scope and that provides a context for queries on the data store”, and accordingly should be given patentable weight. Withdrawal of the objections to claims 9, 11, 14, and 16 is respectfully requested.

Claims 8, 11, 13, and 16 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 8, 11, and 16 have been appropriately amended. With respect to claim 13, the Office Action states that it is unclear what the claimed invention is because the claim does not distinguish the preamble from the body. It is respectfully submitted that the invention claimed in claim 13 is an application programming interface between an application program and a storage platform, as recited in the beginning of the claim; the remainder of the claim recites various features and elements. Withdrawal of the rejections of claims 8, 11, 13, and 16 under 35 U.S.C. § 112, second paragraph, is respectfully requested.

Claims 1-3, 6-9, and 12-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Call (U.S. Patent Application Publication No. 2002/0143521) in view of Vincent, III (U.S. Patent Application Publication No. 2004/0268240) and further in view of Lotter et al. (U.S. Patent Application Publication No. 2002/0184163). It is respectfully submitted that claims 1-3, 6-9, and 12-14 are allowable over the art of record for the reasons set forth below.

The independent claims include the features of synchronizing the storage platform with another storage platform and synchronizing the data store with data sources that

implement proprietary protocols (see application as originally filed, beginning at page 102, for example). These features are neither taught nor suggested by the prior art.

The Office Action acknowledges that Call does not teach or suggest synchronizing a storage platform with another storage platform and synchronizing a data store with data sources that implement proprietary protocols (Office Action, page 6, lines 1-3). Vincent, III fails to cure this deficiency.

The Office Action states that Lotter (Figure 24; paragraphs [0069] and [0071]) teaches synchronizing a storage platform with another storage platform and synchronizing a data store with data sources that implement proprietary protocols. It is respectfully submitted that Lotter, like the other prior art, fails to disclose or suggest such features, however.

Lotter describes a shared industry platform in which industry shared databases may be accessed through a global computer network by various entities. The shared industry platform allows communication among various entities (e.g., companies, consumers, agencies) of the industry (in this case, the insurance industry), regardless of a particular entity's internal processing system. Lotter describes synchronization of data on company databases with data on the industry platform databases (paragraph [0069], last sentence, and paragraph [0071], last sentence). A synchronizer database 69 is maintained by the shared industry platform and is used to perform the database synchronization (Figure 24, paragraph [0132]). However, this type of synchronization is merely the synchronization of a database with another database, and not the synchronization of storage platforms.

Moreover, there is no disclosure or suggestion of synchronizing a data store with data sources that implement proprietary protocols, as claimed. Lotter describes that the shared industry platform allows for interactive communication and secured business processing and data exchange over the Internet. Lotter also describes that the various entities' computers should be connected by internal networks that are highly secured to prevent outside access (e.g., paragraphs [0069], [0071], and [0073]). However, there is no mention or suggestion of data sources that implement proprietary protocols at all.

With respect to this feature, the Office Action states that any internal communication protocol is deemed to be proprietary (Office Action, page 6). It is respectfully submitted that Lotter does not describe or suggest any internal communication protocols, and does not describe or suggest any proprietary protocols at all. The only protocols discussed in Lotter

are HTTP and FTP (e.g., paragraphs [0075] and [0089]), which are not internal communication protocols, and which are not proprietary protocols.

Thus, there is no teaching or suggestion in Lotter of synchronizing a storage platform with another storage platform and synchronizing a data store with data sources that implement proprietary protocols, as recited in the claims. Thus, the prior art, taken alone or in combination, fails to teach or suggest these features of the claims.

The Office Action further states that it would have been obvious to modify Call to include a synchronization service as taught by Lotter because it allows for access standardization across shared data platforms. However, if Call were modified to include the shared industry platform of Lotter, or any of the synchronization functions of Lotter, the claimed invention would not result. Instead, because Call is directed to storing both fixed and variable length data as an addressable array of integer values organized to permit more efficient execution of processing, any synchronization would be performed on the fixed and variable length data itself, and not between storage platforms, and not between a data store and with data sources that implement proprietary protocols.

Claims 8 and 13 include similar features to those described above with respect to claim 1. Based on the foregoing, claims 1, 8, and 13 should not be rejected as being unpatentable over Call in view of Vincent, III and Lotter et al. Thus, claims 1, 8, and 13 are patentable for the reasons set forth above. Claims 2, 3, 6, and 7 are dependent from claim 1, claims 9 and 12 are dependent from claim 8, and claim 14 is dependent from claim 13, and are therefore allowable as well. Withdrawal of the rejections of claims 1-3, 6-9, and 12-14 under 35 U.S.C. § 103(a) is respectfully requested.

Claims 4, 5, 10, 11, 15, and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Call in view of Vincent, III, Lotter et al., and Freyssinet et al. (U.S. Patent No. 6,477,564). Claims 4 and 5 are dependent from claim 1, claims 10 and 11 are dependent from claim 8, and claims 15 and 16 are dependent from claim 13, and are therefore patentable for the reasons set forth above with respect to claims 1, 8, and 13. Freyssinet fails to cure the deficiencies of Call, Vincent, III, and Lotter. Freyssinet describes data routing and transformation but does not teach or suggest synchronizing a storage platform with another storage platform and synchronizing a data store with data sources that implement proprietary

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**PATENT**

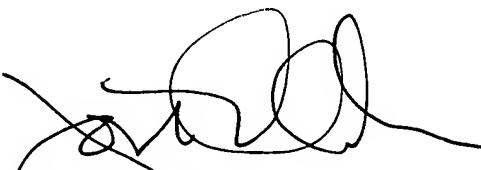
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protocols. Therefore, withdrawal of the rejections of claims 4, 5, 10, 11, 15, and 16 under 35 U.S.C. § 103(a) is respectfully requested.

In view of the foregoing amendments and remarks, Applicants submit that the above-identified application is in condition for allowance. Early notification to this effect is respectfully requested.

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